

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:	§	Chapter 11
	§	
JOANN, Inc., et al	§	Case No. 25-10068 (CTG)
	§	
Post Effective Date Debtors.	§	Jointly Administered

**RESPONSE OF EQYINVEST OWNER II, LTD, LLP TO GUC TRUSTS’S THIRD
OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE FILED CLAIMS)
RELATING TO LANDLORD’S CLAIM NUMBER 17866**

EQYInvest Owner II, Ltd, LLP ("Landlord") hereby submits this Response of EQYInvest Owner II, Ltd, LLP to GUC Trusts’s Third Omnibus Objection to Certain Claims (Late Filed Claims) Relating to Landlord’s Claim Number 17866 relating to the Debtor’s store located in Copperfield Crossing shopping center located in the City of Houston, Harris County, Texas and respectfully represents as follows:

BACKGROUND

1. On November 11, 2025 GUC Trust filed its Third Omnibus Objection to Certain Claims (Late Filed Claims) Relating to Landlord’s Claim Number 17866 relating to the Debtor’s store located in Copperfield Crossing shopping center located in the City of Houston, Harris County, Texas under Docket Entry #1839.
2. Under schedule 1 “Late Filed Claims” Debtors objected as item 15 to EQYInvest Owner II, Ltd, LLP’s claim number 17866 in the total amount of \$153,123.51.
3. As set forth in EQYInvest Owner II, Ltd, LLP’s claim number 17866 the \$153,123.51 claim was timely filed. The underlying lease was rejected by ninth notice of

rejection of certain executory contracts and/or unexpired leases dated and entered on April 30, 2025 effective on or about April 30, 2025 by docket entry number 788 entered on April 30, 2025 by this bankruptcy court.

4. The deadline to file EQYInvest Owner II, Ltd, LLP's claim number 17866 in the total amount of \$153,123.51 was May 31, 2025.

5. EQYInvest Owner II, Ltd, LLP's claim number 17866 in the total amount of \$153,123.51 was filed on May 27, 2025, so it was filed five days before the deadline.

6. Thus GUC Trusts's Third Omnibus Objection to Certain Claims (Late Filed Claims) Relating to Landlord's Claim Number 17866 relating to the Debtor's store located in Copperfield Crossing shopping center located in the City of Houston, Harris County, Texas should be denied because EQYInvest Owner II, Ltd, LLP's claim number 17866 in the total amount of \$153,123.51 was timely filed.

7. The bankruptcy court should deny and overrule the objection to EQYInvest Owner II, Ltd, LLP's claim number 17866 relating to the Debtor's store located in Copperfield Crossing shopping center located in the City of Houston, Harris County, Texas.

8. The undersigned has authority to reconcile, settle or otherwise resolve the claims on behalf of EQYInvest Owner II, Ltd, LLP, being:

Timothy T. Mitchell, attorney for EQYInvest Owner II, Ltd, LLP
4422 Ridgeside Drive
Dallas, Texas 75244
Phone 972-661-9471, cell 972.567.5322.
E-mail tim@rashtiandmitchell.com
Alternate e-mail tim.rashtiandmitchell@gmail.com.

9. EQYInvest Owner II, Ltd, LLP reserves its rights to supplement this response and make such other and further filings as it deems necessary or appropriate.

WHEREFORE, the Landlord, EQYInvest Owner II, LTD, LLP respectfully requests that the Court deny and overrule the objection to EQYInvest Owner II, Ltd, LLP's claim number 17866 and modify any proposed order to allow EQYInvest Owner II, Ltd, LLP's claim number 17866, as is consistent with the foregoing response to objections and that grant the landlord, EQYInvest Owner II, LTD, LLP, such further and additional relief as the Court may deem just and proper.

**Respectfully submitted,
RASHTI AND MITCHELL
ATTORNEYS AT LAW**

/s/ Timothy T. Mitchell

Timothy T. Mitchell

Texas State Bar Number 14223000

Donna Kaye Rashti

Texas State Bar Number 16553400

4422 Ridgeside Drive

Dallas, Texas 75244

Phone 972-661-9471

Fax (972) 503-9611

tim@rashtiandmitchell.com

donna@rashtiandmitchell.com

Attorneys for EQYInvest Owner II, LTD, L.L.P.

CERTIFICATE OF SERVICE

I Timothy T. Mitchell do hereby certify that a true and correct copy of the above foregoing pleading was filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all persons who have registered to receive notices through the CM/ECF system, on this 25th day of November, 2025 and via U.S. Mail and/or e-mail to:

The Clerk of the Court,
824 North Market Street, 3rd Floor,
Wilmington, Delaware 19801

The Office of the United States Trustee for the District of Delaware,
844 King Street, Suite 2207,
Wilmington, Delaware 19801
Attn.: Timothy Jay Fox, Jr. (timothy.fox@usdoj.gov);

Kelley Drye & Warren LLP,
3 World Trade Center, 175
Greenwich Street, New York, New York 10007,
Attn.: Eric R. Wilson (EWilson@KelleyDrye.com),
Maeghan J. McLoughlin (Mmcloughlin@kelleydrye.com),
Charles J. Fendrych (CFendrych@kelleydrye.com)

Benesch, Friedlander, Coplan & Aronoff LLP,
1313 N. Market Street, Suite 1201,
Wilmington, Delaware 19801,
Attn: Jennifer R. Hoover (jhoover@beneschlaw.com)
Steven L. Walsh (swalsh@beneschlaw.com).

/s/ Timothy T. Mitchell
Timothy T. Mitchell
Attorneys for EQYInvest Owner II, LTD, L.L.P.